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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

VERNON UNSWORTH,

Plaintiff,

vs.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DEFENDANT ELON MUSK'S
WITNESS LIST**

Pretrial Conference: Nov. 25, 2019

Trial Date: Dec. 3, 2019

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(i)-(ii), Local Rule 16-5, and the Court's Standing Order for Civil Cases ("Standing Order"), Defendant Elon Musk respectfully submits his Witness List for trial. Asterisks denote witnesses whom Mr. Musk anticipates calling only if the need arises.

Witnesses Defendant Expects to Present

1. David Arnold
2. Jared Birchall
3. Chris Bowman
4. Steve Davis
5. Armor Harris
6. Elon Musk
7. Woranan Ratrawiphukkun (presented by video recording of deposition)
8. Sam Teller
9. Vanessa Unsworth (presented by video recording of deposition)
10. Vernon Unsworth
11. L. Lin Wood*
12. Mark Stephens*
13. Ben Reymenants*
14. Ray Lightfoot (Raymond Huber)*

Mr. Musk reserves the right to amend or supplement this list until trial in light of any case developments, including, but not limited to: (1) as necessary to overcome any evidentiary objections asserted by Plaintiff as to any of Mr. Musk's exhibits or deposition designations; (2) if any witness listed above becomes unavailable for trial; (3) if Mr. Musk decides not to call one or more identified witnesses; (4) any change in position or theories by Plaintiff, his witnesses, or his expert; (5) any rulings by the Court on the parties' motions limine, summary judgment motion, or other pre-trial motions, (6) Plaintiff's responses to proposed

1 stipulations of fact, and (7) any depositions or discovery that occur subsequent to the
2 service of this list. Mr. Musk also reserves the right to call any witness, whether
3 listed or not, live or by deposition for impeachment purposes.

4 If any witness whom Mr. Musk intends to call live at trial becomes
5 unavailable, Mr. Musk reserves its right to call the witness by deposition or call a
6 substitute witness irrespective of whether that substitute witness is listed on its
7 witness list. Mr. Musk also reserves the right to call any witness called by Plaintiff
8 and any witness on Plaintiff's list of trial witnesses.

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10 Dated: November 18, 2019

11 QUINN EMANUEL URQUHART
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17 By: /s/Alex Spiro
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